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September 9, 2024

**Via ECF**

Hon. Valerie Figueredo  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **Harrington Global Opportunity Fund v. BofA Securities, Inc., No. 21-CV-00761**

Dear Judge Figueredo:

We are counsel to a non-party on whom Plaintiff Harrington Global Opportunity Fund served a subpoena duces tecum dated May 16, 2024. Plaintiff recently filed a letter motion dated September 4, 2024 (ECF No. 344) to compel our client to produce the requested documents. On behalf of our client, we write to request approval to file its opposition to the motion to compel under seal and to publicly file a version in which certain portions are redacted. Specifically, our client requests that its name be permanently redacted from its opposition to Plaintiff's letter motion.

Earlier today, Defendant CIBC World Markets, Inc. ("CIBC") filed a request that our client's name be permanently redacted from its (CIBC's) response to Plaintiff's letter motion ("CIBC's Sealing Request," ECF No. 353). Our client respectfully incorporates by reference in this request the arguments CIBC asserts in its Sealing Request, and also joins in CIBC's Sealing Request.

Respectfully,

Davis Wright Tremaine LLP

A handwritten signature in blue ink that reads "Michael V. Rella".

Michael V. Rella

**MEMO ENDORSED**

A handwritten signature in black ink, likely belonging to Valerie Figueredo.

HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE  
DATED: 9-11-2024

Sealing of the relevant documents has been granted based on the Letter Motion at ECF No. 353. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 359.